

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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KATHY BELANGER, on behalf of herself and	:	
all others similarly situated,	:	
	:	Case No. 1:20-cv-3087
<i>Plaintiff,</i>	:	
	:	Hon. John J. Tharp, Jr.
v.	:	
	:	
IBERIA LÍNEAS AÉREAS DE ESPAÑA S.A.	:	
OPERADORA, a foreign corporation d/b/a	:	
“Iberia”,	:	
	:	
<i>Defendant.</i>	:	
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DECLARATION OF RAJ N. SHAH

I, Raj N. Shah, declare as follows:

I am a partner with the law firm of DLA Piper LLP (US), 444 West Lake Street, Suite 900, Chicago, IL 60606-0089, and attorney for Defendant Iberia, Líneas Aéreas de España, S.A. Operadora, Sociedad Unipersonal (“Iberia”) in this matter. I submit this Declaration in connection with Iberia’s Reply in support of its Motion to Dismiss.

1. Attached hereto as Exhibit 1 is a true and correct copy of a printout of Iberia’s Passengers’ Rights, <https://www.iberia.com/us/passengers-rights/>, captured on December 31, 2019 from the Wayback Machine Internet Archive, last accessed October 8, 2020, and publicly available at <https://web.archive.org/web/20191231092625/https://www.iberia.com/us/passengers-rights/>.

2. Attached hereto as Exhibit 2 is a true and correct copy of Iberia's Voucher Request Form as it appeared for U.S. customers on March 23, 2020, entitled "Booking management request due to COVID-19 impact."

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: October 19, 2020

Respectfully submitted,

DLA Piper LLP (US)

s/ Raj N. Shah

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*Attorneys for Iberia, Líneas Aéreas
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Sociedad Unipersonal*

CERTIFICATE OF SERVICE

I hereby certify that on October 19, 2020, I caused a true and correct copy of the foregoing to be filed electronically with the Clerk of the Court by using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all counsel of record registered on the ECF system.

Dated: October 19, 2020

Respectfully submitted,

DLA Piper LLP (US)

s/ Raj N. Shah

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